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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
DEFENDANT OTTO TRUCKING'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL PORTIONS OF ITS SUR-  
REPLY IN SUPPORT OF ITS  
OPPOSITION TO WAYMO LLC'S  
MOTION FOR SANCTIONS (DKT. 1966)**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendant Otto Trucking's Administrative Motion  
7 to File Under Seal Portions of its Sur-Reply in Support of its Opposition to Waymo LLC's Motion for  
8 Sanctions ("Administrative Motion"). The Administrative Motion seeks an order sealing the  
9 highlighted portions of Otto Trucking's Sur-Reply in Support of its Opposition to Waymo LLC's  
10 Motion for Sanctions ("Otto Trucking's Sur-Reply").

11 3. Otto Trucking's Sur-Reply (portions highlighted in green) contains highly sensitive  
12 information that Waymo seeks to seal. Specifically, those portions contain the domain that hosts  
13 Waymo's highly confidential SVN repository and other computer systems. Public disclosure of such  
14 information will give bad actors seeking to hack Waymo's databases a target to attack. Further, there  
15 is no public purpose served by disclosing the precise web or IP address at which the servers reside.

16 4. Waymo's request to seal is narrowly tailored to those portions of Otto Trucking's Sur-  
17 Reply that merit sealing.

18 I declare under penalty of perjury under the laws of the State of California and the United  
19 States of America that the foregoing is true and correct, and that this declaration was executed in San  
20 Francisco, California, on October 10, 2017.

21 By /s/ Felipe Corredor

22 Felipe Corredor  
23 Attorneys for WAYMO LLC

24 **ATTESTATION**

25 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this  
26 document has been obtained from Felipe Corredor.

27 By: /s/ Charles K. Verhoeven  
28 Charles K. Verhoeven